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Attorneys for Defendant
NATIONAL NOTARY ASSOCIATION

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TERESA TURNER, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

v.

NATIONAL NOTARY
ASSOCIATION,

Defendant.

Case No. 2:25-CV-00334-FMO-PD

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT; [PROPOSED ORDER]**

Judge: Fernando M. Olguin

Complaint Served: January 21, 2025
Response Due: February 11, 2025
New Response Date: April 14, 2025

Pursuant to Fed. R. Civ. P. 6 and L.R. 7-1, Plaintiff, TERESA TURNER ("Plaintiff") and Defendant NATIONAL NOTARY ASSOCIATION ("Defendant") (collectively, the "Parties"), hereby stipulate and agree to extend the deadline for Defendant to respond to the Plaintiff's Complaint [Dkt. 1], as follows:

1. On January 21, 2025, Plaintiff served her Summons and Complaint on Defendant. [Dkt. 1, 8]. Defendant's responsive pleading is currently due on February 11, 2025.

2. To allow the Parties additional time to discuss and confer about the allegations in the Complaint, the Defendant's arguments concerning the

1 allegations, and potential resolution of the Complaint, the Parties hereby stipulate
2 and agree to a sixty (60) day extension of time for the Defendant to respond to
3 Plaintiff's Complaint, through and including April 14, 2025.

4 3. There have been no prior requests for extensions submitted to the
5 Court any party. This extension is sought in good faith, is not for the purpose of
6 delay, and will not impact any deadlines in this case (as none have been set).

7 4. Accordingly, the parties hereby stipulate to extend the Defendant's
8 time to respond to Plaintiff's Complaint by sixty (60) days, until April 14, 2025.

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10 IT IS SO STIPULATED.

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12 Dated: February 4, 2025

HEDIN LLP

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15 By: /s/ Frank S. Hedin
Frank S. Hedin

16 Attorneys for Plaintiff TERESA TURNER
17 and the Putative Class

18 Dated: February 4, 2025

CLARK HILL LLP

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21 By: /s/ Myriah Jaworski
Myriah Jaworski

22 Attorneys for Defendant
23 NATIONAL NOTARY ASSOCIATION
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